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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF ALASKA

METLAKATLA INDIAN COMMUNITY, a Federally Recognized Indian Tribe,

Plaintiff,

v.

MICHAEL J. DUNLEAVY, Governor of the State of Alaska, DOUG VINCENT-LANG, Commissioner of the Alaska Department of Fish and Game, and JAMES E. COCKRELL, Commissioner of the Alaska Department of Public Safety

Defendants.

Case No.: 5:20-cv-00008-SLG

JOINT MOTION FOR EXTENSION OF TIME

The parties jointly move the Court for a 14-day extension of the plaintiff Metlakatla Indian Community's deadline to respond to the defendant's Motion for Summary Judgment¹ and for a 90-day extension of the remaining deadlines in the case. The parties agree that the Court's

¹ Plaintiff also intends to simultaneously file a consolidated cross-motion for summary judgment at that time.

resolution of the parties' motions for summary judgment may alter the scope of discovery.

Postponing the deadlines in the case to allow the Court to resolve the motions for summary judgment will avoid significant unnecessary expense. The parties may seek an additional extension depending on the timing of the resolution of the summary judgment motions. Pursuant to Local Rule 7.3(b), all parties consent to the requested extensions.

If granted, the following deadlines would apply:

Deadline	Current Deadline	Proposed New Deadline
Response to State's Motion for Summary Judgment and Cross Motion	10/2/2023	10/16/2023
Final Discovery Witness List	10/30/2023	1/29/2024
Close of Fact Discovery	12/12/2023	3/11/2024
Expert Witnesses Shall be Identified	1/11/2024	4/10/2024
Responsive Supplemental Expert Witnesses	1/25/2024	4/24/2024
Expert Disclosure Reports	2/12/2024	5/13/2024
Rebuttal Reports Due	3/13/2024	6/11/2024
Expert Witness Discovery (include depositions) and Motions Under the Discovery Rules	5/10/2024	8/8/2024
Dispositive Motions and Motions to Exclude Expert Testimony	6/10/2024	9/9/2024



DATED this 22nd day of September, 2023.

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Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the **JOINT MOTION FOR EXTENSION OF TIME** was filed with the Clerk of the Court for the United States District

Court – District of Alaska by using the CM/ECF system. Participants in Case No.: 5:20-cv-00008-SLG who are registered CM/ECF users will be served by the CM/ECF system.

DATED September 22nd, 2023.

HAGLUND KELLEY LLP

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